



October 28, 2015

Brian Nickel, Environmental Engineer  
US EPA Region 10  
Office of Water and Watersheds, NPDES Permits Unit  
1200 Sixth Avenue, Suite 900 M/S OWW-191  
Seattle, WA 98101

**RE: NPDES PERMIT No WA0026662 - ELWHA WATER TREATMENT PLANT**

Attn: Brian Nickel

Please consider this an official notification that I (Michael Greene), employed by Veolia North America (VNA), will be the signatory for the monthly DMR submittals related to NPDES Permit WA0026662 for the Elwha Water Treatment Plant (EWTP). Veolia has operational responsibility for the EWTP under contract with the National Park Service (NPS).

The monthly discharge monitoring reports are submitted by VNA each month on behalf of the US Department of Interior, Bureau of Reclamation and the NPS.

My title, relative to the Elwha Water Facilities (EWF), is: **EWF-Veolia Project Manager**. This title is the same as shown on the monthly DMR submittals.

Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Greene", with a long horizontal line extending to the right.

Michael Greene, PE  
EWF-Veolia Project Manager

Cc: Tracy Gilchrist, NPS  
Richard Bauman, USBOR

10/15 11/12/15 JN

**Eng, Sharon**

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**From:** Keenan, Dru  
**Sent:** Wednesday, November 04, 2015 4:57 PM  
**To:** Eng, Sharon  
**Subject:** FW: Written notification of authorization to sign DMRs for Elwha Water Treatment Plant (WA0026662)  
**Attachments:** DMR\_SIG\_NOTICE\_WA002662\_110315.pdf

Hi Sharon, I'm just following up regarding the above facility. I reviewed the letter and think that it is adequate for authorization of cognizant official. Do you need anything else from me to make the change in ICIS?

Thanks

*Dru*

Druscilla Keenan  
Office of Water & Watersheds M/S-191  
EPA Region 10  
1200 6th Ave  
Seattle, WA 98101  
206-553-1219  
keenan.dru@epa.gov

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**From:** Nickel, Brian  
**Sent:** Tuesday, November 03, 2015 9:14 AM  
**To:** Keenan, Dru <keenan.dru@epa.gov>  
**Cc:** Eng, Sharon <Eng.Sharon@epa.gov>  
**Subject:** FW: Written notification of authorization to sign DMRs for Elwha Water Treatment Plant (WA0026662)

Dru:

With the inclusion of his title, which I think we can reasonably assume means he is "the manager of one or more manufacturing, production, or operating facilities," and "is authorized to make management decisions which govern the operation of the regulated facility," I think this revised letter is acceptable.

What do you think?

Thanks,

Brian Nickel, E.I.T.

Environmental Engineer  
US EPA Region 10 | Office of Water and Watersheds | NPDES Permits Unit  
Voice: 206-553-6251 | Toll Free: 800-424-4372 ext. 6251 | Fax: 206-553-0165  
[Nickel.Brian@epa.gov](mailto:Nickel.Brian@epa.gov)  
<http://epa.gov/r10earth/waterpermits.htm>  
[https://usepa-my.sharepoint.com/personal/nickel\\_brian\\_epa\\_gov/Blog](https://usepa-my.sharepoint.com/personal/nickel_brian_epa_gov/Blog)  
*Please conserve natural resources by not printing this message.*

**From:** Greene, Mike [<mailto:mike.greene@veolia.com>]  
**Sent:** Tuesday, November 03, 2015 9:09 AM  
**To:** Nickel, Brian <[Nickel.Brian@epa.gov](mailto:Nickel.Brian@epa.gov)>

Cc: Gilchrist, Tracy <tracy\_gilchrist@nps.gov>

Subject: Re: Written notification of authorization to sign DMRs for Elwha Water Treatment Plant (WA0026662)

Brian,

I have attached a revised notification letter that states my title relative to the Elwha Water Facilities. It's **EWF-Veolia Project Manager**.

thanks,

mike

On 2 November 2015 at 14:52, Nickel, Brian <Nickel.Brian@epa.gov> wrote:

Mike:

Thank you for the letter. Would you mind telling me what your job title is?

Thanks,

Brian Nickel, E.I.T.

Environmental Engineer

US EPA Region 10 | Office of Water and Watersheds | NPDES Permits Unit

Voice: 206-553-6251 | Toll Free: 800-424-4372 ext. 6251 | Fax: 206-553-0165

[Nickel.Brian@epa.gov](mailto:Nickel.Brian@epa.gov)

<http://epa.gov/r10earth/waterpermits.htm>

[https://usepa-my.sharepoint.com/personal/nickel\\_brian\\_epa\\_gov/Blog](https://usepa-my.sharepoint.com/personal/nickel_brian_epa_gov/Blog)

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From: Greene, Mike [mailto:[mike.greene@veolia.com](mailto:mike.greene@veolia.com)]

Sent: Thursday, October 29, 2015 11:15 AM

To: Nickel, Brian <Nickel.Brian@epa.gov>

Cc: Gilchrist, Tracy <tracy\_gilchrist@nps.gov>

Subject: Re: Written notification of authorization to sign DMRs for Elwha Water Treatment Plant (WA0026662)

Brian,

Attached is the notice that i am the signatory for the Elwha DMR (WA0026662). Hopefully the attached letter will suffice as an official notification. Please contact me if you need anything else.

Thanks,

mike

On 27 October 2015 at 17:05, Nickel, Brian <[Nickel.Brian@epa.gov](mailto:Nickel.Brian@epa.gov)> wrote:

Mike:

As discussed by phone this afternoon, we require a written notification that you are the person authorized to sign monitoring reports for the Elwha Water Treatment Plant NPDES permit (permit #WA0026662).

Authorization to sign reports for an NPDES permit is discussed in federal regulations at 40 CFR 122.22(b):

<http://www.gpo.gov/fdsys/pkg/CFR-2014-title40-vol22/xml/CFR-2014-title40-vol22-sec122-22.xml>

The authorization to sign reports must be made by a person described in 40 CFR 122.22(a), which, for a corporation, is:

*"...a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (i) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental*



*compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures."*

The authorization may name an **individual** (i.e., yourself) or a **position** having responsibility for the overall operation of the facility.

The authorization should be sent to the following address:

Michael Lidgard, Unit Manager

NPDES Permits Unit

US EPA Region 10

1200 Sixth Avenue

Suite 900 M/S OWW-191

Seattle, WA 98101

Thank you,

Brian Nickel, E.I.T.

Environmental Engineer

US EPA Region 10 | Office of Water and Watersheds | NPDES Permits Unit

Voice: 206-553-6251 | Toll Free: 800-424-4372 ext. 6251 | Fax: 206-553-0165

[Nickel.Brian@epa.gov](mailto:Nickel.Brian@epa.gov)

<http://epa.gov/r10earth/waterpermits.htm>

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Michael Greene, P.E.

General Manager, Northwest Water Projects

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10350 SW Arrowhead Creek Lane

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Tel: 503 582-9655 – Cell: 503 807-5241

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